

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Case No. 21-cr-173 (PJS/DTS)

Plaintiff,

**UNITED STATES' AMENDED BILL
OF PARTICULARS FOR
FORFEITURE OF PROPERTY**

v.

1. ANTON JOSEPH LAZZARO,
a/k/a Tony Lazzaro,
a/k/a Tony,

Defendant.

The United States Attorney's Office for the District of Minnesota, by and through Andrew M. Luger, United Attorney, and Craig R. Baune, Assistant United States Attorney, files the following Amended Bill of Particulars.

As a result of the offenses charged in Counts 1 through 7, the defendant shall forfeit the following property to the United States pursuant to Title 18, United States Code, Section 1594:

- (1) Any property, real or personal, involved in, used or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and
- (2) Any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, or any property traceable to such property:

The property subject to forfeiture includes, but is not limited to:

- (a) the real property located at 201 11th Street South, #1920, Minneapolis, MN 55402;

- (b) a 2010 Ferrari Convertible, VIN ZFF65LJA9A0173846;
- (c) an Apple iPhone model A1662 cellphone seized from 201 11th Street South, #1920, Minneapolis, MN 55402 on December 15, 2020;
- (d) a Blackberry cellphone with 32 GB SD Card with IMEI: 015103000107958; and
- (e) a Google Pixel 4A cellphone, Model G025 with IMEI 358118100229242.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: March 3, 2023

ANDREW M. LUGER
United States Attorney

s/Craig Baune
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